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October 28, 2010

## VIA FACSIMILE

Honorable Alvin K. Hellerstein  
Southern District Judge  
United States Court House  
500 Pearl Street  
New York, New York 10007



So ordered.  
10-29-2010

*Alvin K. Hellerstein*

Re: Taylor v. New York City Housing Authority, et al.  
Docket No.: 10 CV 6665

Your Honor:

This firm represents the Defendant New York City Housing Authority (Housing Authority) in the above referenced matter. The Pro Se Plaintiff Ronald Taylor is currently incarcerated in the Gowanda Correctional Facility in Gowanda, New York. Mr. Taylor is a former employee of the New York City Housing Authority. He commenced this suit alleging, among other things, that he was exposed to toxic substances while present at Ground Zero on September 11, 2001 and September 12, 2001 and as a result allegedly sustained cardiac and respiratory problems.

The Housing Authority previously assigned this matter to the firm of Herzfeld and Rubin, P.C. However, they had to return the file due to a conflict. This firm was only retained to appear in this matter on October 26, 2010 and only received a copy of the file on October 27, 2010. The Housing Authority's Answer is currently due on Friday, October 29, 2010. This firm on behalf of the Housing Authority respectfully requests an extension of time of 60 days to Answer or otherwise appear in this matter so that we may review the file for any potential affirmative defenses or viable motions in lieu of an Answer.

Our File No.: 00987,01083

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Given that Plaintiff Mr. Taylor is currently incarcerated, we are unable to obtain his consent to this application.

If you have any questions, please contact me at (212) 915-5815.

Thank you for your attention to this matter.

Respectfully,

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

  
Rose M. J. Charles

RMJC/11